

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

-against-

1:18-cr-00340 (LGS)

SOHRAB "Sam" SHARMA,
RAYMOND "Ray" TRAPANI,
and ROBERT "RJ" FARKAS,

Defendants.

-----X

**DEFENDANT SOHRAB "SAM" SHARMA'S NOTICE OF MOTION IN LIMINE
TO PRECLUDE THE GOVERNMENT FROM OFFERING EVIDENCE OF
UNCHARGED ACTS AND PRIOR CONVICTIONS, PURSUANT TO FEDERAL
RULES OF EVIDENCE 404(b) AND 609**

PLEASE TAKE NOTICE that, upon the annexed declaration of Lauren Bowman, the exhibits thereto, and the accompanying memorandum of law, the defendant Sohrab "Sam" Sharma will move this Court before the Honorable Lorna G. Schofield at the United States District Courthouse, 40 Foley Square, New York, New York 10007, at such a date and time as the Court may direct, for an Order Precluding the Government From Offering Evidence of Uncharged Acts and Prior Convictions, Pursuant to Federal Rules of Evidence 404(b) and 609.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: October 11, 2019
 New York, New York

Respectfully submitted,

/s/ Grant Fondo
Grant P. Fondo, *admitted pro hac vice*
Goodwin Procter LLP
601 Marshall Street
Redwood City, CA 94063

(650) 752-3100
gfondo@goodwinlaw.com

/s/ Lauren Bowman
Lauren Bowman
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018
(212) 813-8800
lbowman@goodwinlaw.com

/s/ Gennaro Cariglio Jr.
Gennaro Cariglio Jr.
8101 Biscayne Boulevard, PH 701
Miami, Florida 33138
(305) 899-0438
Florida Bar No.: 982059
sobeachlaw@aol.com

/s/ Denis Kelleher
Denis Kelleher
Talkin, Muccigrosso & Roberts, LLP
40 Exchange Place
18th Floor
New York, New York 10005
(212) 482-0007
dkelleher@talkinlaw.com

Attorneys for Defendant Sam Sharma

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 11, 2019, a true and correct of the forgoing was furnished by electronic delivery to all counsel of record.

/s/ Lauren Bowman
Lauren Bowman
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018
(212) 813-8800
lbowman@goodwinlaw.com